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March 24, 2020

*Via ECF*

Hon. Kenneth M. Karas, USDJ  
United States District Court, Southern District of New York  
300 Quarropas Street, Room 533  
White Plains, New York 10601

Re. *Congregation Rabbinical College of Tartikov et al. v. Village of Pomona, et al.*, Case No. 07 CV 6304 (KMK)

Your Honor:

We write to request a briefing schedule regarding supplementing our previously filed attorney's fees application.

Pursuant to Fed. R. App. P. 39, Fed. R. Civ. P. 54 and S.D.N.Y. Local Rule 54.1, Plaintiffs intend to supplement their previously filed attorney's fees application to request attorney's fees incurred with respect to the proceedings before the Court of Appeals for the Second Circuit for the portions of the District Court's Order and Judgment that were upheld.

Defendants have also indicated that they intend to seek permission to supplement their opposition to Plaintiffs' previously filed attorney's fees application.

We have reached out to Defendants regarding a proposed briefing schedule, but they have indicated that they will not agree to a briefing schedule regarding Plaintiffs' proposed supplemental filing because they do not believe that Plaintiffs are entitled to such fees. While we disagree with their assertion, we believe that the proper venue for their arguments is in opposition to Plaintiffs' submission. Their objections should not prevent Plaintiffs from making the application.

We therefore respectfully request that the Court adopt the following simultaneous briefing schedule:

- **April 23, 2020-** Plaintiffs will submit their papers to supplement the previously filed attorney's fees application to request attorney's fees incurred with the appeal in this matter, and Defendants will submit their papers to supplement their opposition to Plaintiff's previously filed attorney's fees application;
- **May 14, 2020-** Each side will file their opposition to the other side's April 23, 2020 filing.
- **May 28, 2020-** Each side will file their reply in support of their April 23, 2020 filing.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in cursive script, reading "Donna C. Sobel". The signature is written in black ink on a white background. The first name "Donna" is written in a large, flowing script, followed by "C." in a smaller, more compact script, and "Sobel" in a large, flowing script.

DONNA C. SOBEL

DS/mc  
enc.

cc: All Counsel via ECF